

The present invention (claim 1, and referring to Fig. 1) requires that each leg of the respective terminations has such a means in it: "both the exchange termination and the line termination respectively have a means for connecting to a user interface".

Applicants do not see such a structure taught or suggested by the Examiner.

- 5 The Examiner cites the STM backplane as providing the element of the user interface in the present invention. Thus, the grouping of elements in Brueckheimer provided by the Examiner above would have to reside between: 1) the user interface (i.e., the STM backplane, as indicated by the Examiner) and the exchange termination (not shown), as well as, 2) the user interface (STM backplane) and the line termination (not shown).

- 10 The Examiner states that Brueckheimer does not expressly indicate an exchange termination and a line termination, but notes that it would have been obvious to one of ordinary skill in the art to include an exchange termination and a line termination in such an invention. Applicants are unsure of where these respective terminations could be added in Brueckheimer's Figure 2 to provide the structure indicated by claim 1 of the
15 invention. Specifically, Applicants do not see where the Examiner reasons the exchange termination is located in Brueckheimer.

- In the event that this rejection is maintained in the next office action, Applicants respectfully request that the Examiner clearly indicates: 1) what elements of Brueckheimer constitute the user interface; 2) where the unmentioned (but allegedly
20 obvious) exchange termination is located; 3) where the unmentioned (but allegedly obvious) line termination is located, and 4) what constitutes the conversion means is located between each of these respective elements.

- As noted in the previous Response C, the E1 and the T1 trunk system described in Brueckheimer just have an ordinary line interface function for E1 and T1 transmission
25 lines being operated at a defined transmission rate without providing the function of an

exchange termination or a line termination respectively.

2. *Brueckheimer also does not convey any incentive to realize a decentralized link between an exchange termination and a line termination, known in a digital transmission network as a V reference point, by way of an ATM network*

Although the Examiner indicated that the discussion under paragraphs 2 and 3 in previous Response C were now moot in light of the new grounds of rejection, Applicants respectfully disagree, and reassert these arguments based on the new grounds of rejection, and respectfully request that they be addressed in the Examiner's Response to Arguments section should the rejections be maintained.

The object of the present invention is to provide a transmission system that enables, with an ATM network, the realization of a narrow-band communication system that is simple to install and simple to configure. (Spec. 3/29 - 4/2)

Brueckheimer does not discuss either the problem of building up new narrow-band communication networks or the problem of moving a subscriber terminal from one location to another location necessitating a reconfiguration of connection lines (which the objective of the present invention results from). Consequently, Brueckheimer does not motivate one to realize a V reference point in a digital transmission network by way of an ATM network at all, and thus fails to address to the objective of the present invention.

Brueckheimer just focuses on adapting constant bit rate traffic to the ATM standard and on supporting ISDN services by way of an ATM exchange, whereas the present application states, at 8/27-28, that the design of the ATM network is not essential for the present invention. Thus, Brueckheimer misses the core of the present invention.

Furthermore, Brueckheimer teaches to terminate services comprising the narrow-band system by an ATM multiplexed adapter (see 2/12-14). This is in contrast to the present invention, for the ATM network is just used as a "transit network" and therefore it is definitely intended that calls, i.e., voice services, still can be initiated and terminated
5 by way of a terminal equipment. Consequently, because of these disadvantages, Brueckheimer discourages one from using an ATM network as a "transit network" for transmitting digital signals between an exchange terminal and a line terminal.

The present invention provides a solution to a long-felt and commonly known need to build up new narrow-band communication networks in a very cost-effective way.
10 The present invention addresses an enduring, unmet need to move a subscriber terminal from one location to another location, especially in corporate networks due to organizational changes in working groups, teams, departments, business units and many other entities of a company. These needs have not been satisfied prior to the present invention, despite the fact that the commercial interest in such a solution
15 certainly has always been very high.

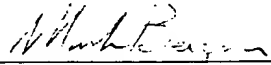
For these reasons, the Applicants assert that the present invention is non-obvious over the prior art because the prior art neither teaches or suggests the elements of claim 1 (and thus, all remaining dependent claims in the application), and respectfully request that the Examiner withdraw the §103(a) rejection from the present
20 application.

Conclusion

Inasmuch as each of the rejections have been overcome by the amendments and arguments presented, and all of the Examiner's suggestions and requirements have been satisfied, it is respectfully requested that the present application be
25 reconsidered, the rejections be withdrawn and that this application be passed to issue.

Respectfully submitted,

5

 (Reg. No. 45,877)

10


Mark Bergner
SCHIFF HARDIN & WAITE
PATENT DEPARTMENT
6600 Sears Tower
Chicago, Illinois 60606-6473
(312) 258-5779
Attorney for Applicants
Customer Number 26574

15

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail in an envelope addressed to: Assistant Commissioner for Patents, Washington, D.C. 20231 on December 21, 2001.

20


Mark Bergner Attorney for Applicants